

EXHIBIT FF

From: [Makitalo, Rebecca I.](#)
To: [Arjun Vasan](#)
Cc: [Keech, Ryan Q.](#); [Chiu, Stacey G.](#); [Winningham, Jacob R.](#)
Subject: RE: Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx
Date: Friday, October 31, 2025 9:35:53 PM

Your correspondence does not comply with the required pre-motion letter to Checkmate setting forth each disputed issue, the legal basis, and requested relief with supporting authority, as required before filing any discovery motion. Further, contrary to your assertion, Checkmate provided availability to meet and confer on both the issues identified in your email and the deficiencies in your initial disclosures. You did not respond to the availability we furnished to meet and confer. Further, the "joint stipulation" you contemplated is not compliant with L.R. 37-2.1. Among other defects, it does not conform to the required format, content, or side-by-side presentation of the parties' positions pursuant to the Local Rules.

To avoid burdening the Court with unnecessary motion practice, please provide (a) a rule-compliant meet-and-confer letter identifying each issue in dispute, the relief sought, and the legal basis and (b) your availability to meet and confer so that we may promptly confer in good faith.

Thank you,

Rebecca Makitalo

Associate
K&L Gates LLP
10100 Santa Monica Blvd
8th Floor
Los Angeles, CA 90067
Phone: 310 552-5502
Cell: 818 251-6956
rebecca.makitalo@klgates.com
www.klgates.com

From: Arjun Vasan <arjun.vasan@gmail.com>
Sent: Friday, October 31, 2025 5:48 PM
To: Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>
Cc: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Winningham, Jacob R. <Jacob.Winningham@klgates.com>
Subject: Re: Arjun Vasan v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx

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This message came from outside your organization.

I will finally note that the email was sent 7 days ago, and in the email I offered to meet any time this week. You did not agree to any of my available times or suggest another.

As it is past work hours on Friday, I will proceed with the filing. If you send your sections of the joint stipulation by midnight, I will include them.

Best regards

On Fri, Oct 31, 2025 at 5:43 PM Arjun Vasan <arjun.vasan@gmail.com> wrote:

No, I said I would circle back on being able to visit your office to discuss "deficient witness disclosures", and I asked for parity or remote meetings. You did not respond.

Best regards

On Fri, Oct 31, 2025 at 5:41 PM Arjun Vasan <arjun.vasan@gmail.com> wrote:

Counsel,

Did you review the attachments when I sent the original email?

To be clear, regarding your earlier posture, you refused to meet on any of the issues I raised unless I discussed my "deficient witness disclosures" in a single issue meeting.

There are several email threads with exactly the same themes. The record will speak for itself.

Best regards,
Arjun Vasan

On Fri, Oct 31, 2025 at 4:25 PM Makitalo, Rebecca I.
<Rebecca.Makitalo@klgates.com> wrote:

Mr. Vasan:

You have mischaracterized both our communications and your efforts. On October 1, 2025, we provided multiple dates and times when Checkmate was available to meet and confer regarding Checkmate's responses to your requests for admissions. You responded that you would "circle back regarding your proposed dates/times," but you did not follow up. In addition, aside from your bare request to meet and confer, you did not provide the letter required by Rule 37-1, which states that "[t]he moving party's letter must identify each issue and/or discovery request in dispute, state briefly as to each such issue/request the moving party's position (and provide any legal authority the moving party believes is dispositive of the dispute as to that issue/request), and specify the terms of the discovery order to be sought."

Again, please promptly transmit a Rule 37-1-compliant letter and provide proposed dates and times for a meet and confer.

Thank you,

Rebecca Makitalo

Associate

K&L Gates LLP

10100 Santa Monica Blvd

8th Floor

Los Angeles, CA 90067

Phone: 310 552-5502

Cell: 818 251-6956

rebecca.makitalo@klgates.comwww.klgates.com

From: Arjun Vasani <arjun.vasan@gmail.com>**Sent:** Monday, October 27, 2025 4:13 PM**To:** Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>**Cc:** Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>;
Winningham, Jacob R. <Jacob.Winningham@klgates.com>**Subject:** Re: Arjun Vasani v. Checkmate.com, Inc. - 2:25-cv-00765-MEMF-ASx

Counsel,

I would note that Judge Sagar's procedures expressly "encourages the parties to avail themselves of the Court's Informal Discovery Dispute Resolution process set forth below", as she finds the process "useful and efficient to address a discrete dispute, scheduling issues, or recalcitrant misconduct in discovery."

I believe we are at such an impasse, and could benefit from guidance on how to proceed. If you refuse to participate, this will be raised in my forthcoming declaration.

Best regards,
Arjun Vasani

On Mon, Oct 27, 2025 at 2:57 PM Arjun Vasani <arjun.vasan@gmail.com>
wrote:

Counsel,

I think the meet and confer record is clear. Checkmate refused to meet on any of these issues unless I "first" met on its issue. The rule is 10 days, not whether your own issue conferred on. I already sent you several L.R. 37-1 letters. If you are willing to accept an informal discovery conference, I would prefer the Magistrate Judge provide guidance. Otherwise, I will proceed with the motion, as stated, on Friday.

Best regards,
Arjun Vasani

On Mon, Oct 27, 2025 at 2:31 PM Makitalo, Rebecca I.
<Rebecca.Makitalo@klgates.com> wrote:

Mr. Vasan,

You have not complied with the Rule 37-1 meet and confer requirement for your proposed discovery motion. You must first request to confer ***in good faith*** and prepare and transmit to Checkmate a letter that: (1) identifies each disputed issue and/or discovery request; (2) succinctly states your position as to each, including any dispositive legal authority; and (3) specifies the exact terms of the discovery order you seek. After having satisfied Rule 37-1, you are to provide a proper joint stipulation in full compliance with Rule 37-2, with only Checkmate's respective sections left to be completed.

Please proceed accordingly.

Thank you,

Rebecca Makitalo
Associate
K&L Gates LLP
10100 Santa Monica Blvd
8th Floor
Los Angeles, CA 90067
Phone: 310 552-5502
Cell: 818 251-6956
rebecca.makitalo@klgates.com
www.klgates.com

From: Arjun Vasan <arjun.vasan@gmail.com>
Sent: Friday, October 24, 2025 12:14 PM
To: Keech, Ryan Q. <Ryan.Keech@klgates.com>; Chiu, Stacey G. <Stacey.Chiu@klgates.com>; Makitalo, Rebecca I. <Rebecca.Makitalo@klgates.com>; Winningham, Jacob R. <Jacob.Winningham@klgates.com>
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Counsel,

Attached please find Plaintiff's portions of the L.R. 37 Joint Stipulation regarding the sufficiency of Checkmate's RFA responses (Sets One–Three). This joint stip tracks Judge Sagar's procedures and L.R. 37.

In the spirit of narrowing disputes, I've grouped RFAs with identical defects and identified a small subset for deeming admitted (objective MIME/filename/URL/body-term items) while proposing that the remainder be cured by Rule-compliant amended answers describing the "reasonable inquiry" required by FRCP 36(a)(4).

Please return your "Opposing Party's Contentions" sections (or proposed amended answers obviating the issue) within 7 days. If I do not receive your portions by then, I will file my motion supported by a declaration attaching this draft and my L.R. 37-1 correspondence. I've attached the word version as well as proposed attachments from my end.

I remain available to meet and confer at your convenience this upcoming week, only on this issue, either in Cerritos, California or remotely.

Regards,
Arjun Vasan, Plaintiff in Pro Per
(562) 900-6541 | arjun.vasan@gmail.com

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